



National Spent Nuclear Fuel Program

# ***DOE Site Compliance Documents***

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*Providing for safe,  
efficient disposition of  
DOE spent nuclear fuel*

## Direction to Sites

- In April 1999, EM-1 directed sites to begin preparing site-specific compliance documents
  - INEEL and SRS issue first drafts in January 2000
  - Hanford expected to release in CY 2000.
- In October 1999, NSNFP suggested the site compliance plans address regulatory requirements until WASRD is issued



# What is a Site Compliance Plan?

- Site-specific plan for demonstrating compliance with each requirement in the CRWMS acceptance criteria.
- The plan would become a binding agreement between EM and RW for waste acceptance
  - per the MOA, RW concurrence is required



# Acceptance Criteria are Still Evolving

- 10 CFR 63 and 40 CFR 197 remain in draft form
- Waste package design undergoing changes
- WASRD R4 under comment resolution
- The analyses (DBE, TSPA, and criticality) are evolving
- Licensing and certification strategy under development



# Near-Term Compliance Plan Focus

- Site-specific implementation should be aligned with draft WASRD R4 and site-specific regulatory requirements
- Continue supporting current licensing strategy focusing on the reliance of engineered systems and less on fuel characterization requirements



# Conclusion

- WASRD R4 is the “first” performance-based criteria for acceptance of DOE SNF (10 CFR 63 based)
- A literal interpretation of WASRD R4 will be difficult for many of DOE fuels
- Compliance plans will identify fuel specific issues and a path forward

